

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CENTRAL LABORERS' PENSION FUND,	)	
<i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 16 C 4628
	)	
JENNIFER Y. WILLIAMS, individually and	)	JUDGE REBECCA R. PALLMEYER
d/b/a J.M. WILLIAMS CONSTRUCTION CO.,	)	
a dissolved Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, JENNIFER Y. WILLIAMS, individually and d/b/a J.M. WILLIAMS CONSTRUCTION CO., dissolved Illinois corporation, in the amount of \$999.08, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,379.00.

On May 6, 2016, the Summons and Complaint was served on the Defendant by tendering a copy of said documents to her personally at her residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 27, 2016. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon \_\_\_\_\_

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 15th day of September 2016:

Ms. Jennifer Y. Williams  
J.M. Williams Construction Co.  
291 Fairway Drive  
Beecher, IL 60401

/s/ Cecilia M. Scanlon \_\_\_\_\_

Cecilia M. Scanlon  
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